REMARKS

Reconsideration of the application in view of the following remarks is respectfully requested. No claims have been canceled or amended. Claims 37-99 are currently pending in the application.

In the Office Action, the Examiner rejected claims 37-39, 44-45, 48, 51-60, 65-66, 69, 72-81, 86-87, 90 and 93-99 under 35 U.S.C. §102(e) as being anticipated by Mangat et al. (U.S. Patent No. 6,081,814 hereinafter, "Mangat"). This rejection is respectfully traversed.

Independent Claim 37

Independent method claim 37 recites:

> A method implemented by a server, comprising:
> receiving a request from a first client to browse contents of a first file system on a first data server, wherein the first data server implements the first file system for managing file access and storage, and wherein the first client is unaware that the first data server implements the first file system;
> selecting a first protocol interpreter from a plurality of different protocol interpreters, wherein the first protocol interpreter implements a first file access protocol which enables interaction with the first file system;
> invoking the first protocol interpreter to interact with the first file system of the first data sever to obtain therefrom a first list of contents, wherein the first list of contents sets forth a hierarchical listing of at least a portion of the contents of the first file system on the first data server, the first list of contents comprising one or more directories and zero or more files; and
> sending at least a portion of the first list of contents to the first client. (emphasis added)

The method of claim 37 provides an advantageous way for a client to interact with the file system of a data server without being aware of the file system that is implemented on the data server. According to claim 37, this is achieved via a server (referred to in the following discussion as the intermediate server). Specifically, when the intermediate

server receives a request from a client to browse the contents of a file system on a data server, the intermediate server selects a protocol interpreter from a plurality of different protocol interpreters. The selected protocol interpreter implements a file access protocol, which enables the intermediate server to interact with the file system on the data server.

Once the protocol interpreter is selected, the intermediate server invokes the protocol interpreter to interact with the file system on the data server. This interaction enables the intermediate server to obtain from the data server a list of contents. This list of contents sets forth a hierarchical listing of at least a portion of the contents of the file system. This list of contents comprises one or more directories and zero or more files. The intermediate server then provides the list of contents to the client. By doing so, the intermediate server in effect provides the client with a view of a portion of the contents of the file system of the data server, thereby allowing the client to browse the file system. This is achieved without the client even being aware of the file system that is implemented on the data server.

Also, because the intermediate server selects the protocol interpreter from a plurality of different protocol interpreters, the intermediate server can, by selecting the proper protocol interpreters, interact with different data servers implementing different file systems. This in turn means that the client, via the intermediate server, can browse the file system contents of different data servers implementing different file systems. Thus, without even being aware of any file system implemented by any data servers, the client is able to browse the file system contents of a number of different data servers implementing a number of different file systems.

Such a method is neither disclosed nor suggested by Mangat. Instead, Mangat discloses a reference environment manger that is capable of creating, modifying, and

accessing multiple environments, each containing certain references related in a manner of significance to a user.

In rejecting claim 37, the Examiner realized that Mangat does not explicitly disclose or suggest the limitation "selecting a first protocol interpreter from a plurality of different protocol interpreters, wherein the first protocol interpreter implements a first file access protocol which enables interaction with a first file system" of claim 37. Nonetheless, the Examiner pushed forward with the rejection, contending that this limitation is implicitly disclosed by Mangat. In support of this rejection, the Examiner stated:

> Mangat discloses the user receiving lists of documents. These documents may be any addressable data structure such as data blocks, text, applications, files, records, databases, fields, executables, or links. Mangat discloses support for viewing, retrieving, or using any text documents, application, spreadsheet, and so forth.... Because any of these types of documents may returned [sic] to the user, the system of Mangat is able to support the transmission of these documents to the user. Therefore, Mangat implicitly discloses selecting a first protocol interpreter from a plurality of different protocol interpreters, wherein the first protocol interpreter implements a first file access protocol which enables interaction with the first file system and invoking the first protocol interpreter to interact with the first file system of the first data server to obtain therefrom a first list of contents.

Basically, the Examiner is saying that because Mangat is able to transmit and view different types of documents, it implicitly must have multiple protocol interpreters that are capable of implementing multiple file access protocols. This reasoning is faulty. It does not logically follow that, just because a component is able to comprehend and view different types of documents, it is also capable of implementing multiple file access protocols to interact with multiple file systems. The two concepts are very different and one does not lead to the other.

To illustrate this point, reference will be made to an example. Suppose that a data server implements a first file system, and that a component that wishes to access the first

file system implements a first file access protocol. The first file access protocol enables the component to interact with the first file system. Suppose further that the first file system contains many different types of files, including for example video files, audio files, executable files, text files, spreadsheets, applications, other data structures, etc. Given this scenario, the component can use the first file access protocol to interact with the first file system of the data server to access any of the files therein. Thus, the component can download from the first file system video files, applications, text files, other data structures, etc. Once the component has these files, it can play/render/view them by invoking the proper types of programs. For example, if the downloaded file is an audio file, then the component can invoke an audio player program. From this example, it is clear that the component can access and download from the first file system any type of file (i.e. any type of document). It is also clear that it can do so using just one file access protocol (in this example, the first file access protocol). Thus, as this example clearly shows, it is not necessary for a component to implement different file access protocols in order to access different file types. Put another way, just because a component can access and render different types of files or documents, it does not follow that that component has to implement multiple file access protocols. In fact, the component does not have to implement multiple file access protocols, as shown by the above example. As made clear by this discussion, the contention set forth in the above excerpt does not hold. That being the case, Mangat does not disclose, either explicitly or implicitly, the limitation "selecting a first protocol interpreter from a plurality of different protocol interpreters, wherein the first protocol interpreter implements a first file access protocol which enables interaction with a first file system" set forth in claim 37. For at least this reason, Applicant submits that claim 37 is patentable over Mangat.

Claims Depending from Claim 37

Claims 38-39, 44-45, 48, and 51-57 depend from, and hence, incorporate all of the limitations of claim 37. These claims also recite further limitations that render them patentable over Mangat. Applicant submits that these claims are patentable over Mangat for at least the reasons given above in connection with claim 37.

Claims 58-60, 65-66, 69, 72-78

Claims 58-60, 65-66, 69, and 72-78 are apparatus claims, which are analogous to the method claims of claims 37-39, 44-45, 48, and 51-57. Applicant submits that claims 58-60, 65-66, 69, and 72-78 are patentable over Mangat for at least the same reasons as those given above in connection with claims 37-39, 44-45, 48, and 51-57.

Claims 79-81, 86-87, 90, 93-99

Claims 79-81, 86-87, 90, and 93-99 are computer readable medium claims which are analogous to the method claims of claims 37-39; 44-45, 48, and 51-57. Applicant submits that claims 79-81, 86-87, 90, and 93-99 are patentable over Mangat for at least the same reasons as those given above in connection with claims 37-39, 44-45, 48, and 51-57.

Claims 40-43, 61-64, and 82-85

In the Office Action, the Examiner rejected claims 40-43, 61-64, and 82-85 under 35 U.S.C. §103(a) as being unpatentable over Mangat in view of Stollfus et al. (U.S. Patent No. 6,321,258, hereinafter "Stollfus"). This rejection is respectfully traversed.

Dependent claims 40-43 depend from, and hence, incorporate all of the limitations of claim 37. If claim 37 is patentable over Mangat and Stollfus, then it follows that claims 40-43 are also patentable over Erlin and Stollfus.

As argued above, Mangat fails to disclose or suggest at least one limitation of claim 37. This limitation is also not disclosed or suggested by Stollfus (and the Examiner has not contended that this limitation is shown by Stollfus). Thus, even if Mangat and Stollfus are combined (assuming arguendo that it would have been obvious to combine the references), the combination still would not give rise to the invention claimed in claim 37. Thus, Applicant submits that claim 37 is patentable over Mangat and Stollfus, taken individually or in combination. Applicant further submits that claims 40-43, which depend from claim 37, are likewise patentable over Mangat and Stollfus for at least the same reasons as those given above in connection with claim 37.

Claims 61-64 are apparatus claims, which are analogous to the method claims of claims 40-43. Applicant submits that claims 61-64 are patentable over Mangat and Stollfus for at least the same reasons as those given above in connection with claims 40-43.

Claims 82-85 are computer readable medium claims, which are analogous to the method claims of claims 40-43. Applicant submits that claims 82-85 are patentable over Mangat and Stollfus for at least the same reasons as those given above in connection with claims 40-43.

Claims 46-47, 49-50, 67-68, 70-71, 88-89, and 91-92

In the Office Action, the Examiner rejected claims 46-47, 49-50, 67-68, 70-71, 88-89, and 91-92 under 35 U.S.C. §103(a) as being unpatentable over Mangat in view of Busey et al. (U.S. Patent No. 5,764,916, hereinafter "Busey"). This rejection is respectfully traversed.

Dependent claims 46-47 and 49-50 depend from, and hence, incorporate all of the limitations of claim 37. If claim 37 is patentable over Mangat and Busey, then it follows that claims 46-47 and 49-50 are also patentable over Mangat and Busey.

As argued above, Mangat fails to disclose or suggest at least one limitation of claim 37. This limitation is also not disclosed or suggested by Busey (and the Examiner has not contended that this limitation is shown by Busey). Thus, even if Mangat and Busey are combined (assuming arguendo that it would have been obvious to combine the references), the combination still would not give rise to the invention claimed in claim 37. Thus, Applicant submits that claim 37 is patentable over Mangat and Busey, taken individually or in combination. Applicant further submits that claims 46-47 and 49-50, which depend from claim 37, are likewise patentable over Mangat and Busey for at least the same reasons as those given above in connection with claim 37.

Claims 67-68 and 70-71 are apparatus claims, which are analogous to the method claims of claims 46-47 and 49-50. Applicant submits that claims 67-68 and 70-71 are patentable over Mangat and Busey for at least the same reasons as those given above in connection with claims 46-47 and 49-50.

Claims 88-89 and 91-92 are computer readable medium claims, which are analogous to the method claims of claims 46-47 and 49-50. Applicant submits that

claims 88-89 and 91-92 are patentable over Mangat and Busey for at least the same reasons as those given above in connection with claims 46-47 and 49-50.

For the reasons set forth above, Applicant respectfully submits that claims 37-99 are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all pending claims is hereby respectfully solicited.

Respectfully submitted,

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